KAREN P. HEWITT
United States Attorney
RAVEN M. NORRIS
Assistant U.S. Attorney
California State Bar No. 232868
United States Attorney's Office
880 Front Street, Room 6293
San Diego, California 92101-8893
Telephone: (619) 557-7157
Facsimile: (619) 557-5004

Attorneys for the Petitioner

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA, Petitioner, v. NATALIE L. FITCH, Respondent.	Case No. 08cv 0530-IEG (CAB) JOINT MOTION FOR EXTENSION OF TIME FOR RESPONDENT'S COMPLIANCE WITH THIS COURT'S JUNE 3, 2008 ORDER [Fed. R. Civ. P. 6(b)(1)]

COME NOW THE PARTIES, Petitioner United States of America by and through counsel, Karen P. Hewitt, United States Attorney, and Raven M. Norris, Assistant United States Attorney, and Respondent Natalie L. Fitch, pro se, and hereby jointly move the Court to extend the July 2, 2008 deadline for Respondent's compliance with this Court's Order Granting Petitioner to Enforce IRS Summons issued on June 3, 2008. The Court order directed Respondent to appear before IRS Revenue Agent Steve Silverman or designee, on July 2, 2008, at 9:00 a.m., at the offices of the Internal Revenue Service located at 880 Front Street, Suite 3255, San Diego, California, and to produce the documents and give testimony as directed in the summonses. On July 1, 2008, Respondent notified Agent Silverman that she has had difficulty producing all required documentation and testimony by July 2, 2008 but indicated that she would be able to fully comply by July 14, 2008. In light of Respondent's good faith effort to comply with the IRS summons and this Court's Order, the parties agreed that additional time is necessary for Respondent to comply with this Court's Order and the IRS Summonses.

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Accordingly, in order to pursue resolution of Petitioner's claims without the intervention of the Court, and without waiving Petitioners' right to pursue sanctions for contempt of court for failure to comply with this Court's Order, the parties jointly request an extension of time. Based upon the foregoing, it is respectfully requested that the Court enter an order, under FED. R. CIV. P. 6(b)(1), re-setting the deadline for the Respondent to appear before Revenue Agent Steve Silverman or designee, to **July 14, 2008**, at 9:00 a.m., at the offices of the Internal Revenue Service located at 880 Front Street, Suite 3255, San Diego, California, and to produce the documents and give testimony as directed in the summonses.

Dated: July 3, 2008

Respectfully submitted,

KAREN P. HEWITT
United States Attorney

s/ Raven M. Norris
RAVEN M. NORRIS
Assistant U.S. Attorney
Attorneys for Petitioner
Email: Raven.Norris@usdoj.gov

Dated: July 3, 2008

N. F. Fitch
NATALIE L. FITCH
Respondent

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA, Petitioner, v. NATALIE L. FITCH, Respondent.	)	Case No. 08CV0530 IEG(CAB) CERTIFICATE OF SERVICE

IT IS HEREBY CERTIFIED THAT:

I, Raven M. Norris, am a citizen of the United States and am at least eighteen years of age. My business address is 880 Front Street, Room 6293, San Diego, California 92101-8893.

I am not a party to the above-entitled action. I have caused service of the Joint Motion to Extend on the following parties by electronically filing the foregoing with the Clerk of the District Court using its ECF System, which electronically notifies them.

none

I hereby certify that I have caused the foregoing to be mailed, by the United States Postal Service, to the following non-ECF participants on this case:

Natalie L. Fitch
13848 Honnell Way
Jamal, CA 91935

the last known address, at which place there is delivery service of mail from the United States Postal Service.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on July 2, 2008

s/ Raven M. Norris
RAVEN M. NORRIS